

# Third round of data requests to Dominion Energy South Carolina, Inc.

prepared by London Economics International LLC

September 13<sup>th</sup>, 2021



*London Economics International LLC ("LEI") was selected by the Public Service Commission of South Carolina ("SC PSC") to serve as a qualified, independent third-party consultant in Docket No. 2021-88-E, Dominion Energy South Carolina, Inc. ("DESC")'s 2021 avoided cost proceeding.*

*This document contains the third set of data requests ("DRs"), LEI-3, to DESC.*

## 1 Instructions

1. Responses to these requests should be provided to Stella Mueller via email ([stellam@londoneconomics.com](mailto:stellam@londoneconomics.com)) within twenty (20) calendar days of the date of service. To the extent that DESC is able to respond by September 16<sup>th</sup>, LEI will be able to consider the response in writing the Independent Report; otherwise, the material will be useful in future responses to interrogatories.
2. Responses to these requests should be labeled using the same numbers as used in Section 3 below.
3. If the requested information is found in other places or in other exhibits, reference shall not be made to those, but instead, the information should be reproduced and placed in the responses to these requests in the appropriate sequence.
4. All documents shall be provided in their native format (e.g., Word, Excel, PowerPoint), with all functions, data, and formulas intact.
5. These requests shall be deemed continuing so as to require DESC to supplement or amend its responses as any additional information becomes available, up to October 13<sup>th</sup>, 2021 – i.e., the last day that LEI is scheduled to testify in the above referenced docket.
6. Answer each request on the basis of the entire knowledge of DESC, including information in the possession of DESC or its consultants, representatives, agents, experts, operating divisions, business divisions, assigns, partners, and attorneys, if any.
7. If any request cannot be answered in full, please respond to the extent possible and specify the reasons for DESC's inability to respond.

## 2 Definitions

As used herein, the following terms shall have the meaning and be interpreted as set forth below:

1. "Application" is defined as the application filed by Dominion Energy South Carolina, Inc. on April 22<sup>nd</sup>, 2021, or as otherwise revised.

2. "DESC" and "Company" are defined as Dominion Energy South Carolina, Inc., its parent(s), subsidiaries, affiliates, predecessors, successors, officers, directors, agents, employees, and other persons acting in its behalf.
3. "Workpapers" and "documents" are defined in the broadest terms and should not be construed as limited to the listed examples, or limited only to items that are currently within DESC's control or custody. Such documents include, but are not limited to, published materials, reports, correspondence, emails, records, memoranda, notices, notes, marginal notations, messages, teletype printouts, statements, books, studies, minutes, diagrams, drawings, maps, surveys, plans, charts, graphs, data, computer files, billings, evaluations, photographs, audio tapes, and videotapes.

### 3 Data requests

**LEI-3.1** Referring to the rebuttal testimony of witness James W. Neely, filed on August 10<sup>th</sup>, 2021, regarding DESC's avoided capacity cost rates and underlying technology cost assumptions:

"The aero-CT costs used came from the interactions with turbine vendors and accurately reflect the costs that DESC would have to pay for the turbine being modeled. First, to use a generic cost is not appropriate when actual cost data is available." (p. 16)

1. Please provide additional context regarding DESC's "interactions with turbine vendors". For example, what was the purpose and scope of these interactions?
2. If the underlying technology cost assumptions used by DESC were based on a vendor survey, please provide additional details on the survey – for example, how many vendors were contacted, when they were contacted, and the time-frame for which the cost estimates apply.
3. Mr. Neely notes that the "aero-CT costs used came from the interactions". Do these costs include the capital costs **and** the fixed operating and maintenance expenses ("FOM") used by DESC in its modeling? If not, what source was used by DESC for the FOM assumption of an aero-CT?
4. If DESC has already provided access to this material in previous DR responses, please direct LEI to where this information can be found.